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April 1, 2015

Via ECF and First Class Mail

The Honorable Lorna G. Schofield  
United States District Judge for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: Thind v. Healthfirst, Inc., et al., Civil Action No.14-CV-09539(LGS)

Dear Judge Schofield:

We are counsel for Plaintiff in the above referenced matter. We write with the consent of defense counsel to respectfully request an adjournment of both the time for Plaintiff to file his conditional certification motion and for discovery to conclude.

Kelly A. Magnuson, the attorney who has been handling this matter since its inception, is leaving the firm very shortly due to a family move to the Albany area. In order to properly handle the transition to another member of the firm and represent our client's best interests, we seek an adjournment of the April 24, 2015 date for filing the certification motion until May 24, 2015. We also seek an extension of the deadline for the completion of discovery from June 17, 2015 until July 17, 2015.

We thank the Court for the courtesy of entertaining this request.

Respectfully submitted,



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Michael J. Borrelli, Esq.  
*For the Firm*